

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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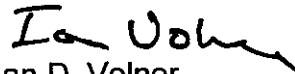
POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

INTERROGATORIES OF
RECORDING INDUSTRY ASSOCIATION OF AMERICA
TO USPS WITNESS KINGSLEY
(RIAA/USPS-T-39-1)

Pursuant to Sections 25 and 26 of the rules of practice, the Recording Industry Association of America submits the attached interrogatories to USPS witness Kingsley: RIAA/USPS-T-39-1.

Respectfully submitted,



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Counsel for RIAA

October 15, 2001

RIAA/USPS-T39-1. Please refer to page 19 of your testimony where you state, "Prior to implementation of the residual shape surcharge, many, if not all, of these pieces were prepared as machinable parcels."

(a). Please confirm that by "these pieces" your testimony memo pieces with the C050 dictated dimensions of flats that have a thickness between .75 and 1.25 inches.

(b) Please provide all data that you are aware of that quantifies the extent to which Standard Mail "parcels" with thicknesses between 3/4" and 1-1/4" were prepared as machinable parcels prior to implementation of the residual shape surcharge.

(c) Please provide all data that you are aware of that quantifies the extent to which Standard Mail "parcels" with thicknesses of less than 3/4" were prepared as machinable parcels prior to implementation of the residual shape surcharge.

(d) Please provide all data that you are aware of that quantifies the extent to which Standard Mail "parcels" with thicknesses between 3/4" and 1-1/4" are being prepared as automation flats since implementation of the residual shape surcharge.

(e) Please provide all data that you are aware of that quantifies the extent to which Standard Mail "parcels" with thicknesses of less than 3/4" are being prepared as flats since implementation of the residual shape surcharge.

(f) Please provide the FY 2000 piece distribution by ounce increment of Standard Mail "parcels" with thicknesses of between 3/4" and 1-1/4". Please identify and describe the data source that was used to develop these figures.

(g) Please provide the FY 2000 piece distribution by ounce increment of Standard Mail "parcels" with thicknesses of between 3/4" and 1-1/4" that are being prepared as automation flats. Please identify and describe the data source that was used to develop these figures.

(h) Please provide the FY 2000 piece distribution by ounce increment of Standard Mail "parcels" with thicknesses of between 3/4" and 1-1/4" that are being prepared as machinable parcels. Please identify and describe the data source that was used to develop these figures.

(i) Please provide the FY 2000 piece distribution by ounce increment of Standard Mail "parcels" with thicknesses less than 3/4". Please identify and describe the data source that was used to develop these figures.

(j) Please provide the FY 2000 piece distribution by ounce increment of Standard Mail "parcels" with thicknesses of less than 3/4" that are being prepared as flats. Please identify and describe the data source that was used to develop these figures.

(k) Please provide the FY 2000 piece distribution by ounce increment of Standard Mail "parcels" with thicknesses of less than 3/4" that are being prepared as machinable parcels. Please identify and describe the data source that was used to develop these figures.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record to date in this proceeding in accordance with section 12 of the rules of practice.



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